

LODGED CLERK, U.S. DISTRICT COURT
3/5/2025
CENTRAL DISTRICT OF CALIFORNIA BY: _____ MMC _____ DEPUTY

UNITED STATES DISTRICT COURT

FILED CLERK, U.S. DISTRICT COURT
3/5/2025
CENTRAL DISTRICT OF CALIFORNIA BY: bm DEPUTY

United States of America,

v.

JOSE ANTONIO BONILLA,

Defendant.

Case No. 2:25-MJ-01199-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, Zaira Bonilla, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of October 18, 2024, in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

8 U.S.C. § 1326(a)

*Offense Description*Illegal Alien Found in the United States
Following Deportation or Removal

This criminal complaint is based on these facts:

Please see attached affidavit. Continued on the attached sheet.

/s/ Zaira Bonilla, Special Agent
Complainant's signature

Zaira Bonilla, Special Agent
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 3/5/2025

Jean Rosenbluth
Judge's signature
City and state: Los Angeles, California

Hon. Jean Rosenbluth, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Zaira D. Bonilla, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against JOSE ANTONIO BONILLA ("BONILLA" or "defendant"), charging him with violating Title 8, United States Code, Section 1326(a), Illegal Alien Found in the United States Following Deportation.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF AFFIANT DEPORTATION OFFICER ZAIRA D. BONILLA

3. I am a Deportation Officer ("DO") with the United States Department of Homeland Security ("DHS"), Immigration and Customs Enforcement ("ICE"). I have been a DO with ICE, formerly known as the Immigration and Naturalization Service ("INS") since September 2015. I am currently assigned to the Los Angeles Enforcement and Removal Operations ("ERO") field office. Prior to working for ICE as a DO, I worked as an Immigration Enforcement Agent with ICE since September 2006.

III. STATEMENT OF PROBABLE CAUSE

4. On or about October 18, 2024, a DO from the Los Angeles Fugitive Operation Team, Ventura Sub-Office, Immigration and Customs Enforcement was searching the Megan's Law Public database¹ and found JOSE ANTONIO BONILLA, a registered sex offender with a 2010 conviction for California Penal Code § 647.6 (annoying or molesting a child under 18). The DO recognized BONILLA's name, date of birth, and photograph from his previous arrest on November 30, 2020, conducted by him and the Fugitive Operation Team in Lancaster, CA. Based on the DO's review of EARM Database records, which is an internal ICE law enforcement database, it was determined that BONILLA was previously deported from the United States. On February 17, 2025, at approximately 8:38 a.m., the DO conducted surveillance and observed BONILLA driving to his work at 210 E. Avenue L, Lancaster, CA, in a vehicle registered to him and bearing license plate number 9NSR093.

5. Based on my training and experience, I know that a DHS "A-File" is a file in which immigration records are maintained for aliens admitted to or found in the United States. I also know that a DHS A-File usually contains photographs, fingerprints, court records of conviction, and records relating to deportation or other actions by INS or DHS with respect to the subject alien for whom the DHS A-File is maintained.

¹ The Megan's Law database is a list of registered sex offenders in California, available at <https://www.meganslaw.ca.gov/Disclaimer>.

6. On or about February 18, 2025, I obtained and reviewed DHS A-File A094-309-836, which is maintained for the subject alien "Jose Antonio Bonilla." The DHS A-File contained the following documents and information:

a. Photographs of the subject alien to whom this specific DHS A-File corresponded. I reviewed the photographs in the DHS A-File to photographs of the Megan's Law Public website of BONILLA. I thus determined that this DHS A-File and its contents corresponded to BONILLA.

b. One executed Warrant of Removal/Deportation (Form I-205) indicating that defendant was officially removed from the United States on or about January 15, 2021. I know from my training and experience that a Warrant of Removal is executed each time a subject alien is removed and excluded from the United States by ICE (and its predecessor agency, INS) and usually contains the subject's photograph, signature, and fingerprint. The executed Warrant of Removal/Deportation in defendant's DHS A-File contained his photograph, signature, and fingerprint.

c. A certified conviction record showing that defendant was convicted on or about April 22, 2010, of annoying or molesting a child under 18, a misdemeanor, in violation of Penal Code Section 647.6, in the Superior Court of California, County of Los Angeles, Case Number MA041803-01, for which defendant was sentenced to a total term of 34 days in jail.

d. Various documents, in addition to the Warrant of Removal/Deportation, indicating that defendant is a native and

citizen of El Salvador. These documents included (1) an Order of the Immigration Judge, dated January 9, 2018, ordering defendant removed to El Salvador, (2) a birth certificate, and (3) an expired passport number B349944 stating that BONILLA is a citizen of El Salvador.

7. On or about February 18, 2025, I reviewed the printouts of the Criminal Identification Index ("CII"). Based on my training and experience, I know that the CII database tracks and records arrests and convictions of individuals according to an individual's CII number. The CII printouts confirmed that defendant had been convicted of the crime reflected on the documents contained in defendant's DHS A-File.

8. On or about February 18, 2025, I reviewed the printouts of ICE computer indices on defendant. Based on my training and experience, I know that the ICE computer indices track and document each time an alien is deported or excluded from the United States by ICE, was deported or excluded by the former INS, or is granted permission to enter or re-enter the United States. The ICE computer indices confirmed that defendant had been removed, deported, and/or excluded on the date indicated on the Warrant of Removal/Deportation, found in defendant's DHS A-File. The ICE computer indices further indicated that defendant had not applied for, nor obtained from the Attorney General or the Secretary of Homeland Security, permission to re-enter the United States.

9. Based on my review of defendant's DHS A-File, I determined that it does not contain any record of his ever

applying for, nor receiving from the Attorney General or the Secretary of Homeland Security, permission to re-enter the United States. Based on my training and experience, I know that such documentation is required to re-enter the United States legally after deportation, and that if such documentation existed, it would ordinarily be found in defendant's DHS A-File.

IV. CONCLUSION

10. For all the reasons described above, there is probable cause to believe that defendant has committed a violation of Title 8, United States Code, Section 1326(a), Illegal Alien Found in the United States Following Deportation.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 5th day of March 2025.



HON. JEAN P. ROSENBLUTH
UNITED STATES MAGISTRATE JUDGE